

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, ET AL.

Plaintiffs,

v.

BRIAN KEMP, ET AL.

Defendants.

**Civil Action
No. 1:17-cv-02989-AT**

NOTICE OF REQUESTED CALL WITH THE COURT

Plaintiffs Coalition for Good Governance, Ricardo Davis, Laura Digges, William Digges III, and Megan Missett (“Coalition”) in compliance with the Court’s Order [Doc. 122] hereby request a telephone conference with the Court and Defendants to discuss unresolved controversies concerning Defendants’ ongoing refusal to preserve relevant electronic records. Coalition and Defendants have conferred repeatedly as required by the Order and continue to reach impasse.

As has generally been the Defendants’ practice since the inception of the case, Coalition’s repeated requests for litigation hold on voting system electronic records on DRE’s, optical scanners, memory cards, voter access cards, and the data stored on the same have been ignored. Electronic equipment has generally has been reprogrammed, deployed into insecure polling places and used for voting without creating a copy of relevant electronic data and without regard to the preservation

requirements, including the instructions of this Court. Such prohibited activity continues as the Defendants prepare for the July 24, 2018 primary run-off.

Coalition seeks instruction from the Court as to the manner in which it should describe for the Court the manner in which these issues have arisen and the efforts Coalition has repeatedly, but unsuccessfully, made to resolve these issues without the necessity of Court intervention. If helpful to the Court, Coalition is prepared to brief the facts in relevant details ahead of the call. Coalition appreciates the Court's attention to this matter and awaits instructions.

Dated: June 16th, 2018.

Respectfully submitted,

/s/ Cary Ichter

CARY ICHTER

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/s/ Robert A. McGuire, III

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Admitted Pro Hac Vice (ECF No. 125)

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*Attorneys for Plaintiff Coalition for Good
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CERTIFICATE OF COMPLIANCE

I hereby certify pursuant to LR 7.1D, NDGa that the foregoing document has been prepared with one of the font and point selections approved by this Court in LR 5.1C, NDGa, using a 14-point Times New Roman font.

/s/ Cary Ichter

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CERTIFICATE OF SERVICE

This is to certify that I have this day caused the within and foregoing **Notice of Requested Call With the Court** to be served upon all other parties in this action by electronic service via to be served via electronic delivery using the PACER-ECF system as authorized by LR 5.0(A), NDGA upon all counsel of record.

Dated: July 16, 2018

/s/ Cary Ichter

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